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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

CHRISTOPHER WISE, MICHAEL
MARTINEZ, CHRISTOPHER DURKEE, and
SAVANNAH GUEST, individuals,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal
corporation; OFFICER STEPHEN B.
PETTEY, in his individual capacity; JOHN
DOES 1-60, individual and supervisory
officers of Portland Police Bureau; U.S.
DEPARTMENT OF HOMELAND
SECURITY; U.S. MARSHALS SERVICE;
JOHN DOES 61-100, individual and
supervisory officers of the federal government,

Defendants.

Case No. 3:20-cv-01193-IM

**DECLARATION OF NATHAN
R. MORALES IN SUPPORT OF
PLAINTIFFS' MOTION TO
CORRECT THE DOCKET AND
REINSTATE THE FEDERAL
AGENCY DEFENDANTS AS
PARTIES**

1- DECLARATION OF NATHAN R. MORALES

I, Nathan R. Morales, declare as follows:

1. I am an attorney with the law firm Perkins Coie LLP, and am counsel of record for Plaintiffs in this case. I am over the age of 18 and if called as a witness I could testify competently to the facts below.

2. On May 25, 2022, Plaintiffs served the Federal Agency Defendants with Interrogatories and Requests for Production of Documents (the “Discovery Requests”). Attached as Exhibit A to this declaration, is a true and correct copy the Discovery Requests.

3. On June 8, 2021, counsel for the Federal Agency Defendants sent a letter to counsel for Plaintiffs’, refusing to respond to the Discovery Requests. Attached as Exhibit B to this declaration, is a true and correct copy of that letter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 13, 2021

/s/ Nathan R. Morales
Nathan R. Morales

DATED: July 13, 2021.

PERKINS COIE LLP

By: /s/ Nathan R. Morales

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2- DECLARATION OF NATHAN R. MORALES

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